

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOHN DOE 1, JANE DOES 1-3, JACK DOES 1-1750, JOAN DOES 1-750,

Plaintiffs,

v.

KATHY HOCHUL, in her official capacity as Governor of the State of New York, HOWARD A. ZUCKER, in his official capacity as Commissioner of the New York State Department of Health, TRINITY HEALTH, INC., NEW YORK-PRESBYTERIAN HEALTHCARE SYSTEM, INC., WESTCHESTER MEDICAL CENTER ADVANCED PHYSICIAN SERVICES, P.C.

Defendants.

Case No. 1:21-cv-05067-AMD-TAM

**DECLARATION OF KATHLEEN
HOFFMAN IN SUPPORT OF
TRINITY HEALTH CORPORATION'S
MOTION TO DISMISS THE
COMPLAINT**

I, Kathleen Hoffman, declare and state as follows:

1. I am an employee of Trinity Health Corporation and my current title is Regional Chief Human Resources Officer. I make this Declaration based on my personal knowledge and information obtained within the scope of my employment. If called upon to testify to the facts set forth below, I could, and would, do so truthfully and competently.

2. I understand that Plaintiffs have filed a Complaint against Trinity Health Corporation (incorrectly captioned as Trinity Health, Inc.), among other defendants, with the United States District Court for the Eastern District of New York on September 10, 2021.

3. I understand from a review of the Complaint that only Jane Doe 3 specifies a claim against Trinity Health, Inc. Specifically, Jane Doe 3 alleges that she is employed at St. Joseph's Health Hospital ("St. Joseph's") in New York as a registered nurse.

4. Notably, Jane Doe 3 fails to identify the location of St. Joseph's Health Hospital and likewise fails to identify her own address.

5. St. Joseph's Health Hospital has no facility located within the Eastern District of New York.

A. Relevant Facts Regarding Trinity Health Corporation

6. Trinity Health Corporation is a Michigan Corporation headquartered at 30555 Victor Parkway in Livonia, Michigan. The senior leadership for Trinity Health Corporation works out of its Livonia, Michigan headquarters.

7. From September 2021 to present, Trinity Health Corporation has not had any employees based in Kings, Nassau, Queens, Richmond or Suffolk Counties in New York state.

8. In fact, Trinity Health Corporation has never had any employees based out of Kings, Nassau, Queens, Richmond or Suffolk Counties in New York state, since its formation in 2000.

9. Moreover, Trinity Health Corporation is not affiliated with any subsidiary ministries or member entities that are located in, operate out of, or do business in any other manner in Kings, Nassau, Queens, Richmond or Suffolk Counties in New York state. This has been true since Trinity Health Corporation's formation in 2000.

10. Trinity Health Corporation has never had a subsidiary ministry or any of its members located in Kings, Nassau, Queens, Richmond or Suffolk Counties in New York state, since its inception.

I declare, under penalty of perjury, that the foregoing is true and correct and is stated upon my personal knowledge.

Executed on February 15, 2022.

s/Kathleen Hoffman

KATHLEEN HOFFMAN

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